

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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FULL CREATIVE, LTD. d/b/a I.C.B. ASIA, CO., LTD.,

Plaintiff,

04 Civ. 2907 (RJH)(GWG)  
*Action No. 1*

- against -

SOLE CITY, INC., SOLOMON SAFDEYE,  
ALAN KANDALL, JEFFREY BERNSTEIN and  
MARC DOLCE,

Defendants.

**PROPOSED ORDER**

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INNOVATIVE CUSTOM BRANDS INTL., INC.,

Plaintiff,

4 CV 2937 (RJH)  
*Action No. 2*

- against -

SOLE CITY, INC., SOLOMON SAFDEYE,  
ALAN KANDALL, JEFFREY BERNSTEIN and  
MARC DOLCE,

Defendants.

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AND NOW, this        day of October, 2004, upon consideration of the  
Motion of Plaintiff Full Creative, Ltd. d/b/a I.C.B. Asia, Co., Ltd. in *Full Creative, Ltd. v.*  
*Sole City, Inc., et al*, 04 Civ. 2907 (RJH)(GWG) ("Action 1") and Plaintiff Innovative  
Custom Brands Intl., Inc., in *Innovative Custom Brands, Intl., Inc. v. Sole City, Inc., et al*,  
04 Civ. 2937 (RJH)(GWG) ("Action 2") (collectively "Plaintiffs") to Compel Discovery,  
it is hereby ordered that Sole City, Inc. ("Sole City") and Solomon Safdeye ("Safdeye")  
(collectively "Defendants") and Kane Kessler, P.C. ("Kane Kessler") produce Sole City's  
electronic records to Plaintiffs immediately upon entry of this Order; and

IT IS FURTHER ORDERED THAT Kane Kessler's Motion to be Relieved as Counsel for Defendant Sole City be denied pending the appearance of substitute counsel; and

IT IS FURTHER ORDERED THAT default judgment will be granted for Plaintiffs in Action 1 and Action 2 if Sole City fails to obtain substitute counsels within 30 days of entry of this Order.

Dated: New York, New York  
October \_\_\_\_, 2004

SO ORDERED

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Hon. Richard J. Holwell  
United States District Judge